

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

IN RE CPI AEROSTRUCTURES  
STOCKHOLDER DERIVATIVE LITIGATION

Master File No. 1:20-cv-02092

**NOTICE OF UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF DERIVATIVE  
SETTLEMENT AND APPROVAL OF SHAREHOLDER NOTICE**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Plaintiffs Paul Berger and Keith Moulton will move this Court, on a date and time as may be designated by the Court, before the Honorable Eric N. Vitaliano, at the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an order: (i) granting preliminary approval of the proposed Settlement of this derivative action, pursuant to Federal Rule of Civil Procedure 23.1; (ii) approving the form and manner of notice of the proposed Settlement to the Class; and (iii) setting a date for final approval thereof, and a schedule for various deadlines relevant thereto. In support of this motion, Plaintiffs submit the accompanying Memorandum of Law and the Declaration of Matthew M. Houston in Support of the Unopposed Motion For Preliminary Approval.

Dated: June 16, 2022

Respectfully submitted,

/s/ Matthew M. Houston

Matthew M. Houston  
Benjamin I. Sachs-Michaels  
GLANCY PRONGAY & MURRAY LLP  
745 Fifth Avenue, 5th Floor  
New York, NY 10151  
Telephone: (212) 935-7400  
Facsimile: (212) 753-3630  
bsachsmichaels@glancylaw.com  
mhouston@glancylaw.com

*On Behalf of Plaintiff Keith Moulton*

/s/ Beth A. Keller

Beth A. Keller  
LAW OFFICES OF BETH A. KELLER, P.C.  
118 North Bedford Road, Suite 100  
Mount Kisco, New York 10549  
Telephone: (914) 752-3040  
Facsimile: (914) 752-3041  
bkeller@keller-lawfirm.com

-and-

Laurence D. Paskowitz  
PASKOWITZ LAW FIRM P.C.  
208 East 51st Street, Suite 380  
New York, NY 10022  
Telephone: (212) 685-0969  
lpaskowitz@pasklaw.com

*On Behalf of Plaintiffs Paul Berger and  
Robert Garfield*